

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and)	WC Docket No. 11-42
Modernization)	
)	
Telecommunications Carriers Eligible for)	WC Docket No. 09-197
Universal Service Support)	
)	
Connect America Fund)	WC Docket No. 10-90
)	

COMMENTS OF SOLIX, INC.

Eric D. Seguin
Senior Vice President
Government Programs
Solix, Inc.
30 Lanidex Plaza West
Parsippany, NJ 07054
973.581.7676
Eric.Seguin@solixinc.com

August 31, 2015

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	SOLIX LIFELINE ADMINISTRATION EXPERIENCE & BEST PRACTICES	3
A.	CENTRALIZED STATE PROGRAMS.....	3
1.	TEXAS LOW-INCOME DISCOUNT ADMINISTRATOR	3
2.	CALIFORNIA LIFELINE	7
3.	DISTRICT OF COLUMBIA (DC) LIFELINE	8
4.	NEVADA LIFELINE.....	9
5.	ARKANSAS LIFELINE INDEPENDENT VERIFICATION EFFORT	9
B.	COMMERCIAL LIFELINE SERVICES	10
1.	WIRELESS	10
2.	RURAL ILECS	10
C.	DISCOUNTED BROADBAND PROGRAMS	11
III.	NATIONAL VERIFIER/NATIONAL GATEWAY	12
IV.	PROGRAM TRAINING	17
V.	PROGRAM OUTREACH	18
VI.	TRANSITION	20
VII.	CLOSING.....	21

APPENDIX A

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	
Connect America Fund)	WC Docket No. 10-90
)	

COMMENTS OF SOLIX, INC.

I. INTRODUCTION

Solix, Inc. (“Solix”) respectfully submits the following comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Second Further Notice of Proposed Rulemaking (“FNPRM”) intended to further reform and modernize the Lifeline program (“Lifeline” or “Program”). Solix applauds the Commission’s efforts in undertaking additional reforms to modernize and further transform this important program.

Solix is a business process management provider with expertise in complex program administration, eligibility determination and customer care. Solix administers 18 centralized Lifeline programs or state universal service related funds,¹ and provides

¹ Solix administers centralized Lifeline processes in Arkansas, the District of Columbia, Nevada and Texas. Solix also implemented the centralized California LifeLine program in 2006. Additionally, Solix administers state universal service funds and telecommunications relay service funding mechanisms in

Lifeline certification services to more than 50 eligible telecommunications carriers (“ETCs”). Relatedly, Solix implemented the eligibility solution for Connect2Compete, EveryoneOn’s flagship broadband access program for K-12 students, and provides discounted broadband eligibility solutions for Cox, Comcast and Suddenlink. Solix also performs application processing and eligibility reviews of requests for funding through the federal universal service Schools and Libraries (“E-Rate”) program under contract to the Universal Service Administrative Company (“USAC”).

Across this range of program administration experience, Solix has gained first-hand exposure to efficient and effective centralized eligibility processing that incorporates comprehensive data security and internal controls and provides appropriate levels of guidance to applicants to support program understanding and compliance with rules.

Based on its experience, Solix recommends that the Commission implement a hybrid federal-state approach in establishing a National Lifeline Eligibility Verifier that takes advantage of state processes where they exist while ensuring a centralized process through a national “gateway” that allows for intake, maintenance and analysis of all Lifeline applicant information, regardless of whether the verification is performed by the national verifier or by a state or third-party administrator. Solix recommends that the Commission standardize required data elements to improve the consistency of Lifeline eligibility decisions nationwide and to allow for an effective exchange of information between the national verifier and the state processes. This would result in a

Alaska, Arizona, Colorado, Connecticut, the District of Columbia, Hawaii, Indiana, New Mexico, Nevada, Oregon, Pennsylvania, Puerto Rico, Texas and Vermont.

national solution with comprehensive oversight abilities while leveraging the years of progress and investment made by states with existing or planned processes.

II. SOLIX LIFELINE ADMINISTRATION EXPERIENCE & BEST PRACTICES

A. CENTRALIZED STATE PROGRAMS

Below are brief summaries of centralized state Lifeline verification processes and commercial Lifeline eligibility solutions administered by Solix. This information is presented to the Commission to provide examples of a range of process solutions and customer interfaces that have proven successful. While this information is high level, Solix is prepared to provide further details to Commission staff as to the structure, costs, benefits and challenges of deployed solutions.

1. TEXAS LOW-INCOME DISCOUNT ADMINISTRATOR

Solix has supported the Public Utility Commission of Texas (“PUCT”) by serving as the Texas Low-Income Discount Administrator (“LIDA”) since 2004. The statewide centralized Texas LIDA process utilizes two methods for Lifeline enrollment: coordinated enrollment and self-enrollment. Through coordinated enrollment, Solix receives a monthly file from the Texas Health and Human Services Commission (“HHSC”) that identifies all Texas recipients of benefits from the Supplemental Nutrition Assistance Program (“SNAP”), Medicaid, Temporary Assistance for Needy Families (“TANF”), and health benefit coverage under the Children’s Health Insurance Plan (“CHIP”). The file provided by the HHSC is updated every month, thereby producing a current and accurate monthly snapshot of the individuals in the state eligible for Lifeline based on this set of federal assistance programs.

Self-enrollment provides an application process for individuals that receive benefits from FCC-approved programs not administered by the HHSC or who meet the state-established income threshold of less than 150% of the federal poverty guidelines (“FPG”).² Solix reviews the self-enrollment applications received from applicants to ensure compliance with program requirements. After reviewing supporting documentation such as proof of qualifying program eligibility or income documentation such as W-2’s or tax returns, Solix issues eligibility decisions. Self-enrollment customers approved for Lifeline remain eligible for the discount for seven months, at which time they must re-apply and qualify following the same requirements as during the initial certification process.

In addition to the information provided by the HHSC and self-enrollees, all ETCs in Texas are required to provide the LIDA with a monthly file that details all of the ETC’s residential customers. The LIDA combines the HHSC, self-enrollment and ETC data files and, utilizing address standardization and identity verification software, produces an initial list of all subscribers potentially eligible for a Lifeline discount for that month.

A secondary matching process is then executed to identify any duplicate Lifeline-eligible telephone numbers at the same household address, and by individual Social Security Number (“SSN”) to identify potential duplicate Lifeline benefits across providers. Consistent with the *Lifeline Reform Order*,³ applicants are notified of duplicate records and informed of the process for selecting a single Lifeline provider or, alternatively, documenting that the residence satisfies the criteria of a separate economic unit thereby allowing multiple discounts at the same residence. After all

² Public Utility Commission of Texas, Substantive Rules, §26.412(d)(1).

³ See *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Report and Order and Further Notice of Proposed Rulemaking (2012) (*Lifeline Reform Order*).

duplicate resolution processes are complete, each ETC receives a file listing its company-specific subscribers eligible to receive a Lifeline discount for the month.

ETCs are able to access the LIDA system to conduct real-time verifications of Lifeline customer eligibility and to check whether a customer is receiving a Lifeline discount from another service provider. The LIDA “reservation process” also allows carriers to optionally reserve a customer for a 60-day period. A customer can be reserved after a service provider verifies eligibility and confirms that the customer is not currently being served, or after a service provider receives a request from a customer to switch from another provider. This reservation process allows for smooth transitions when a customer switches to a new service provider, and offers a system-controlled means to prevent multiple carriers from claiming the same Lifeline customer. It also permits a prepaid wireless carrier, at its option, to provide a customer with a phone after successfully reserving the eligible customer but prior to the monthly process.

As described above, Texas utilizes a coordinated enrollment process which includes a monthly data feed from the Texas HHSC. The FCC currently seeks comment on how to leverage such relationships.⁴ Coordinated enrollment at the state level drives efficiency as the PUCT and the HHSC are able to seamlessly exchange information that provides eligible low-income consumers with access to needed support while maintaining a high degree of program integrity as consumers deemed eligible for Lifeline support based on files provided by the HHSC have already been determined eligible for other state programs that utilize common eligibility criteria.

⁴ See *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Second Further Notice of Proposed Rulemaking et al., FCC 15-71, para. 98 (2015) (*Lifeline Reform Second FNPRM*).

The most recent data for Texas shows that approximately 85% of Lifeline customers are deemed eligible through coordinated enrollment and 15% apply through the self-enrollment process. Of the 15% who apply through self-enrollment, approximately 50% apply based on income guidelines, which equates to approximately 7.5% of the total applicant universe.

Throughout all phases of the operation, the PUCT oversees data security and integrity, performs quality reviews of eligibility decisions and customer service interactions, and evaluates program outcomes against goals. Solix recommends that the FCC consider a range of issues if adopting a similar model of directly interfacing with social services agencies, including data security, data sharing agreements, customer privacy, electronic file exchange formats, database structures, and the costs associated with implementing and/or upgrading systems to accomplish program objectives.

The FCC also seeks comment on whether consumers should be permitted to directly interface with a third-party eligibility verifier.⁵ Direct interaction with consumers is an effective means to accurately and consistently convey program requirements while providing a high level of customer service. As described above, the Texas LIDA process includes two eligibility options. The self-enrollment, or individual application process, with direct access to a third-party eligibility verifier has proven to be an important and effective option for Texas residents.

To accommodate direct interactions with Solix as the third-party verifier, the PUCT website provides a toll-free number and E-mail address for those consumers who want to apply through self-enrollment. Consumers have the option of contacting Solix'

⁵ See *Lifeline Reform Second FNPRM*, FCC 15-71, para. 66.

call center for live assistance, 24x7x365 in English or Spanish, or they can submit an application to Solix via mail or FAX. Texas applicants also have access to a Customer Service Portal, which provides E-mail capability to submit questions, request an application status or escalate issues. By September 2015, customers will also be provided with an option to apply online, including uploading supporting documents.

2. CALIFORNIA LIFELINE

Solix implemented the centralized California LifeLine program on behalf of the California Public Utilities Commission (“CPUC”) in 2006 and served as program administrator through May 2012. During this period, Solix handled in excess of 50 million customer interactions. After first successfully reducing the eligible customer base in accordance with program guidelines, Solix qualified more than 11 million Californians for Lifeline discounts over this six-year period.

Examples of best practices implemented by Solix in support of the LifeLine program include customized data exchange methods with service providers and targeted outreach strategies to interact with Lifeline applicants. Like the carrier interface approach deployed in Texas, Solix developed a number of options to allow service providers with differing resource levels to securely exchange data on either a real-time or near real-time basis. In 2011, Solix also successfully deployed CPUC-approved program changes that allowed wireless carriers to participate in the LifeLine process.

Consumers were afforded a range of application methods from paper-based submissions to online recertifications. Solix initially rolled out online application functionality in 2008. By 2011, the number of applications submitted online had increased by more than 175%. Applicants were also provided with the option to access

an Interactive Voice Response (“IVR”) system to obtain program information, with the ability to opt out to live call center support in seven languages. An effective means of reminding applicants of pending due dates or recertification dates included the use of outbound dialers. To better reach those applicants who preferred paper interactions, market research was conducted and it was determined that pink envelopes improved response rates so this customized outreach technique was implemented. These carrier- and customer-centric solutions were accomplished while maintaining annual administration costs at less than 4% of total program costs.

3. DISTRICT OF COLUMBIA (DC) LIFELINE

Under contract to the Public Service Commission of the District of Columbia (DC PSC), Solix has administered the centralized DC Lifeline program since 2013. The DC Lifeline program provides a centralized mechanism to collect and disburse Lifeline funds and to provide eligibility processing and duplicate checking to ensure program integrity.

Lifeline applicants in DC can access a website for program information or an application, and live call center support is provided in seven languages: English, Spanish, Amharic, Chinese, French, Korean and Vietnamese. As part of the certification process, applicant information is verified against the National Lifeline Accountability Database (“NLAD”). Solix provides comprehensive Lifeline activity reports to the DC PSC for program oversight and monitoring.

4. NEVADA LIFELINE

Under the direction of the Public Utilities Commission of Nevada (“PUCN”), Solix operationalized the Nevada Lifeline program in March 2015, with mandatory participation by all ETCs to be effective on January 1, 2016. The Nevada Lifeline process includes a direct interface between the Nevada HHSC and Solix which allows for real-time lookups of applicant eligibility based on Nevada HHSC program eligibility. This centralized process allows carriers to exchange data on a real-time basis, verify customer eligibility, check for duplicates, transfer customers, and appeal administrative decisions.

Solix’ call center provides initial screening of Lifeline applicant eligibility and processes Lifeline applications and supporting documentation in English and Spanish. Outreach is conducted with consumers throughout the application process lifecycle to ensure understanding of program requirements. Final eligibility decisions are communicated to all applicants whether approved or denied for Lifeline support.

5. ARKANSAS LIFELINE INDEPENDENT VERIFICATION EFFORT

In support of legislation enacted in 2010, Solix administers the Arkansas Lifeline Independent Verification Effort (“ALIVE”) on behalf of an association of rural local exchange carriers. Solix provides centralized Lifeline eligibility reviews and customer service support directly to applicants. Customers of the participating carriers have access to call center agents, in English and Spanish, for programmatic questions and application status inquiries.

For the ALIVE certification process, all Lifeline applications and supporting documentation are mailed to Solix for review and eligibility decisions. After completing eligibility reviews, Solix notifies each carrier of its eligible Lifeline customers and provides the data necessary for reporting to the USAC.

B. COMMERCIAL LIFELINE SERVICES

1. WIRELESS

Solix has provided Lifeline eligibility support services to Virgin Mobile/Sprint (“Sprint”) since 2009. Sprint’s prepaid wireless application process offers customer touch points through several channels. Solix provides application intake, eligibility reviews, system design and maintenance, program activity reporting and customer service support.

Applicants are able to contact call center representatives to better understand Lifeline program eligibility requirements and to inquire about the status of pending applications. Applicants are also able to access a website to securely apply. For recertification, applicants are afforded the same options as initial certification as well as an IVR system that allows for automated customer recertification. A mobile device interface allows for real-time checks against the NLAD and state verification databases with status confirmations almost immediately presented back to the applicant.

Solix provided similar Lifeline eligibility services to Cricket Wireless prior to Cricket’s acquisition by AT&T.

2. RURAL ILECS

Solix provides Lifeline eligibility review services to 48 rural incumbent local exchange carriers (“ILECs”) operating in states throughout the U.S. Although the

majority of these ILECs have relatively small and stable Lifeline bases, their customers are afforded similar service options including live call center support for program questions and application status inquiries. Solix also provides annual recertification services to an additional eight ILECs.

C. DISCOUNTED BROADBAND PROGRAMS

Consistent with the Commission's objective of increasing broadband adoption among low-income households, several cable companies presently offer discounted broadband service to qualifying low-income households. Solix deployed the initial eligibility process used by Connect2Compete, now under the umbrella of EveryoneOn, as well as the eligibility processes utilized by Comcast, Cox Communications and Suddenlink for determining customer eligibility for broadband discounts.

Broadband discount programs typically provide streamlined application and eligibility verification processes driven by household eligibility for the National School Lunch Program ("NSLP"). An automated IVR system offers pre-screening of applicants based on initial eligibility questions such as customer name, address, school district, eligibility for free or reduced school lunch, and current broadband subscribership.

Customers that pass the initial screening are transferred to Solix' call center for live agent assistance in completing the application process. During this interaction, the customer service agent performs a real-time review using the approved eligibility algorithm based on high school lists and census data. Customers that satisfy the algorithm logic can be auto-enrolled for the discount.

Applicants can also access an online application. Applicants answer the same series of eligibility questions to determine whether they satisfy the initial screening criteria to request an application and/or if they satisfy the algorithm-based logic to qualify for auto-enrollment. Applicants that are not auto-enrolled are sent a pre-populated, bar-coded application along with instructions for submitting the required supporting documentation. Returned applications are reviewed for eligibility and customers are notified of required actions if an application contains a correctable deficiency. All applicants are notified of approval or denial decisions.

III. NATIONAL VERIFIER/NATIONAL GATEWAY

The Commission seeks comment on how states with centralized Lifeline processes or databases should interact with a national verifier.⁶ In 2012, Solix submitted comments to the FCC proposing a potential hybrid federal-state approach to Lifeline eligibility administration that could minimize structural changes to existing processes while maximizing program efficiency and consolidating Lifeline program data.⁷ This approach proposed three “tracks” for eligibility reviews, with Lifeline eligibility decisions made by: 1) state administrators, 2) ETCs or 3) a centralized, national administrator. Based on the FCC’s current desire to remove carriers from the Lifeline eligibility verification process,⁸ Solix proposes that the Commission adopt a modified version of the previously articulated approach by using a national “gateway” or

⁶ See *Lifeline Reform Second FNPRM*, FCC 15-71, para. 73.

⁷ See Comments of Solix, Inc., WC Docket No. 11-42 et al., p.4 (filed April 2, 2012).

⁸ See *Lifeline Reform Second FNPRM*, FCC 15-71, para. 63.

portal for the secure transfer of program information into a comprehensive Lifeline data repository housed by the national verifier.

Building on the Commission's stated desire to reduce administrative burdens by leveraging existing systems and processes, a national gateway could be designed to achieve federal objectives while accommodating those solutions already in place. A gateway could achieve the benefits of centralization and coordination without deconstructing existing and successful processes. The design and deployment of two data pathways could provide the necessary flexibility (see Appendix A for further detail).

Pathway 1: Required applicant information is submitted directly to the national verifier, with Lifeline eligibility reviews conducted by the national verifier in those cases for which no state system or process exists.

Pathway 2: Required applicant information is submitted to a state or third-party administrator in those cases for which a state-specific process exists or is implemented. Direct interfaces through the gateway would allow for real-time Lifeline customer updates and data sharing between the states/third-party administrators and the national verifier.

Under Pathway 1, when an applicant applies for Lifeline in a state with no centralized process, the required information would be submitted to the national verifier for an eligibility review. The resulting applicant information would remain with the national verifier and would be populated in the national Lifeline data repository. Under Pathway 2, when an applicant applies for Lifeline where there is a state or third-party administered process, Lifeline eligibility decisions and relevant customer information

could be transferred using direct, real-time data transfers via the gateway. Updates to customer records outside the annual certification or recertification process could be accomplished in the same way to ensure that customer records are fully updated and synchronized.

In order for a gateway or portal to be effective, data elements and file structures would need to be standardized with comprehensive data security measures in place. A national gateway could effectuate a single, real-time source of all Lifeline subscriber information thereby permitting duplicate checking capability, customer status reviews and business intelligence and reporting capabilities to support program integrity, auditing and evaluation. The result would be a robust national solution that allows for oversight by the national verifier while leveraging the years of progress and investment made by states with existing processes.

This approach could accomplish numerous Commission objectives and programmatic efficiencies, including:

- 1) Removing the responsibility of conducting Lifeline eligibility determination from ETCs;
- 2) Creating a fully centralized repository of Lifeline program data to maintain program integrity and minimize the potential for waste, fraud and abuse;
- 3) Enabling consistent and targeted messaging and outreach to all Lifeline program participants regardless of place of residence or service provider;
- 4) Allowing for a national verifier solution for those states that do not wish to implement a state-specific program;
- 5) Fostering data sharing and transparency at the national level while efficiently interacting with those states that desire to maintain or implement centralized processes;
- 6) Leveraging investments in existing eligibility and duplicate checking databases;
- 7) Providing a central channel for implementing program changes and revising criteria, such as incorporating broadband support or modifying the programs that serve as the basis for Lifeline eligibility;

- 8) Achieving maximal utility of standardized data formats and business intelligence capabilities;
- 9) Improving access to and auditability of all customer data through a single point of control and transaction logging; and
- 10) Providing further Commission oversight to support consumer protection and appeals processes.

The Commission also requests comment on reducing the administrative burden on states while ensuring compliance through monitoring and audits.⁹ The secure exchange of standardized data elements between the national verifier and the states or third-party administrators via the gateway would achieve this goal while permitting any desired customized treatment by states to leverage local knowledge and objectives. This solution would also accommodate program evolution and evaluation over time as data requirements could be centrally controlled and modified.

Data Security

The Commission seeks comment on reasonable data security practices that should be adopted.¹⁰ The critical importance of collecting, processing and safeguarding data for federal and state processes highlights the need to implement comprehensive data security measures, including formal procedures and controls that safeguard physical and electronic access to information. Commercially reasonable and prudent measures, such as encrypting full data files and sensitive data, should be taken as appropriate to protect applicant information.

A comprehensive solution should ensure that security is handled from various perspectives including:

⁹ See *Lifeline Reform Second FNPRM*, FCC 15-71, para. 79.

¹⁰ See *Lifeline Reform Second FNPRM*, FCC 15-71, para. 65.

- Multifactor Authentication for system users to gain access
- Secure transmission of data whereby data is encrypted while in transit
- Databases and data at rest that are fully encrypted
- Physical access to data secured and limited to authorized personnel only

Development and testing environments, within which the system can be maintained and enhanced, should protect applicant data by implementing techniques that obfuscate Personally Identifiable Information (“PII”) while in these environments. Security procedures must ensure compliance with relevant statutes, rules and regulations regarding data privacy, for example, Health Insurance Portability and Accountability Act (“HIPAA”) requirements and National Institute of Standards and Technology (“NIST”)¹¹ data security standards. Systems and networks should be continuously monitored. Additionally, network and system penetration testing and vulnerability scanning should be performed on a routine basis to verify the robustness of security firewalls and mitigate vulnerabilities.

Business continuity and disaster recovery must also be incorporated to ensure the ability to maintain operations and high levels of Recovery Time Objectives (“RTO”) and Recovery Point Objectives (“RPO”). Consideration should be given to regional separation to insulate the system and to strive for an Active/Active system model. This will ensure minimal system impact in the case of disasters and allow the program to run without interruption.

A national Lifeline solution should be designed to be highly maintainable and both horizontally and vertically scalable. Processing workflows should be built using technologies such as Intelligent Business Processing Management systems (“iBPMS”), which allow for agile reactions to program changes while maintaining the integrity of the

¹¹ National Institute of Standards and Technology, <http://www.nist.gov/information-technology-portal.cfm>.

supporting code base. Additionally, the system should provide Business Activity Monitoring (“BAM”) functionality to monitor process efficiency and accuracy.

Application intake should be flexible enough to handle all forms of processing while utilizing technologies that maximize efficiency. Optical Character Recognition (“OCR”), IVR, web forms, scanning, File Transfer Protocol (“FTP”) and mobile intake in adherence to the various technology standards should be available options. Input should be accomplished using common shared Application Programming Interfaces (“APIs”) to ensure a single source for data handling. A centralized solution implemented with the aforementioned technologies and functionalities would provide security across processes while maintaining business rules and controls that generate consistent and auditable eligibility decisions.

IV. PROGRAM TRAINING

As highlighted by the Commission, individuals taking part in the enrollment and recertification process must have sufficient and current training on program rules.¹² A central administrator can craft a pool of expert reviewers that are provided with comprehensive and uniform training to ensure compliance with program rules and requirements. Expert reviewers reduce variation in the application of rules and provide consistent and auditable eligibility decisions. Common training combined with regular performance reviews and feedback loops drive a thorough understanding of the proper procedures for processing program information and safeguarding consumer data.

One complexity of reviewing Lifeline applications is the analysis of supporting documentation provided by applicants, especially income documents. A centralized and

¹² See *Lifeline Reform Second FNPRM*, FCC 15-71, para. 214.

expert work force becomes more familiar with legitimate and acceptable documents, and utilizes cross-training practices that result in a more knowledgeable, accurate and productive pool of reviewers. As importantly, centralized administration provides the flexibility to manage staffing and resources in accordance with fluctuations in application volumes, thereby reducing administrative costs and the burden on consumers. Further, ETCs benefit by eliminating non-core eligibility review functions, allowing them to focus on serving their customers.

V. PROGRAM OUTREACH

A key best practice that drives program success is to provide consumers with flexibility in technology and communication vehicles. A one-size-fits-all approach does not meet the needs of all applicants. While it is more efficient to transition to technology-based solutions, it is important to retain traditional options such as paper applications and mailings for those who are more comfortable with these media.

In working with applicants across a range of low-to-moderate income (“LMI”) programs and in response to natural disasters (e.g., Hurricane Sandy impacted individuals and businesses), it is evident that early, comprehensive and consistent communication of program requirements is vital. Consistency in communication is especially important as it provides the opportunity to reinforce important messages while setting expectations.

The use of multiple channels to disseminate information is equally important. Many state agencies and Lifeline service providers establish partnerships with a broad range of stakeholders to expand program outreach efforts. As Lifeline-eligible

households are apt to receive other subsidies, information can be disseminated as part of other interactions. Thus, a potential applicant could be informed of the Lifeline benefit concurrent with the process of applying for other programs. To the extent that information detailing multiple programs can be shared in a single location or through common channels, applicants will be better informed of available options and able to coordinate enrollment across programs.

Effective outreach can include partnering with low-income housing providers such as the Department of Housing and Urban Development (“HUD”), the United States Department of Agriculture (“USDA”), public housing authorities, non-governmental organizations, community-based organizations, Community Housing Development Organizations (“CHDOs”), Continuum of Care members and other state and local support providers such as foreclosure prevention agencies. Coordinated efforts can effectuate shared communication with supportive housing networks, Federal Emergency Management Agency (“FEMA”) Disability Initiatives, Veteran’s Administration (“VA”) programs and Community Renewal Act initiatives.

Information can also be disseminated in conjunction with existing programs assisting LMI and vulnerable populations. EveryoneOn, a national digital inclusion nonprofit, has effectively deployed this outreach model by distributing program information at locations where eligible LMI populations receive services, including public schools and libraries; SNAP distribution offices; state and county agencies that manage LIHEAP, Medicaid, weatherization, and related programs; food pantries and kitchens; and grocery stores. Most recently, EveryoneOn’s digital inclusion model has been a key player in the national ConnectHome demonstration project, which will provide low-

cost Internet service and technology education through HUD-assisted housing in 28 communities across the United States. All of these services seek to provide LMI populations with affordable, home broadband access, which is a key component in ending the digital divide.

VI. TRANSITION

The modifications to the Lifeline program under consideration by the Commission are intended to modernize the program while enhancing program integrity and potentially directing support to new areas. Some of these actions may require additional levels of investment by the Commission and by states to achieve the desired program outcomes. A solution that results in a comprehensive repository of Lifeline customer information using a single gateway or portal to securely transfer required data elements could provide cost savings and program integrity benefits to all stakeholders.

With regard to a reasonable transition period, a lead time of 18-24 months would be realistic for designing, building, testing and deploying a national system. An initial step would be to implement program and process design changes to standardize required Lifeline data elements and supporting documentation requirements. System requirements could then be developed to incorporate the necessary data structures and security environments. Following design, time and resources would be needed to accomplish quality assurance, user, capacity and security testing.

Lifeline service providers impacted by the implementation of a national verifier would likely need to develop required system interfaces and conduct much of the same testing as for the design of the national solution. Based on Solix' experience in

implementing Lifeline platforms and technology solutions, it seems reasonable that service provider transition activities could be completed within 6-12 months after being provided with programmatic and system requirements.

An important consideration during any transition process is the management of existing customer records and documents. It would not be cost effective to require service providers to transfer multiple years of customer records to the national verifier. Accordingly, one transition consideration should be the clear definition and communication of customer documentation storage, retention and destruction requirements for those records in existence prior to and after the transition.

VII. CLOSING

Solix appreciates the opportunity to provide these comments and stands ready to provide additional information that may be helpful to the Commission during its examination of these issues.

Respectfully submitted,

SOLIX, INC.

By: Eric D. Seguin
Eric D. Seguin
Senior VP, Government Programs
Solix, Inc.
30 Lanidex Plaza West
Parsippany, NJ 07054
973.581.7676
Eric.Seguin@solixinc.com

August 31, 2015

National Lifeline Gateway

